

EXHIBIT B

REQUEST NO. 27: Produce all statements of witnesses, potential witnesses, or persons interviewed in connection with this case.

RESPONSE: To the extent this Request seeks information that is work product and/or core work product, Defendant asserts the work-product privilege. Subject to the foregoing assertion of privilege, Defendant has no documents responsive to this Request.

REQUEST NO. 28: Produce all documents reviewed, relied upon, considered, or created by expert(s) to testify at trial.

RESPONSE: Defendant has no documents responsive to this Request.

REQUEST NO. 29: Produce all documents obtained pursuant to subpoena, release, or authorization relating to this case.

RESPONSE: Defendant has no documents responsive to this Request.

REQUEST NO. 30: Produce all safety meeting sign-in sheets for any safety meetings attended by any of the Plaintiffs.

RESPONSE: See responsive documents attached hereto as Exhibit E.

REQUEST NO. 31: Produce all job safety analysis reports, work permits, work performance reports, project instructions, project outlines, or any other documentation regarding or related to the performance of any specific welding or other work done or to be done by any of the Plaintiffs.

RESPONSE: Defendant has no documents responsive to this Request.

REQUEST NO. 32: Produce all invoices and/or other documents evidencing, relating to or regarding Defendant's charges to its customers for work done by each Plaintiff during the Relevant Time Period.

RESPONSE: Defendant objects to this Request on the grounds it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 33: Produce all documents showing mileage reimbursement/payment to any of the Plaintiffs for work performed out in the field as opposed to in the Midland Yard itself.

RESPONSE: Defendant has no documents responsive to this Request.

REQUEST NO. 34: Produce all contracts or agreements between Defendant and any of the Plaintiffs regarding services/work to be performed by any of the Plaintiffs.

RESPONSE: Defendant has no documents responsive to this Request.

Respectfully submitted,

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on August 10, 2017, a true and correct copy of the foregoing instrument was served on all parties via e-mail as follows:

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